

DOCKET FILE COPY ORIGINAL

ORIGINAL
RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Part 61 of the
Commission's Rules Requiring Metric
Conversion of Tariff Publications
and Supporting Information

CC Docket No. 93-55

COMMENTS OF BELL ATLANTIC¹

The Commission should adopt either its first or second proposed option in order to include metric measurements in carrier tariffs.² The first option would require carriers to insert a conversion table in each tariff to afford users a convenient way of ascertaining the metric equivalents of English measures specified in the tariff.

The second proposal, to include a parenthetical metric equivalent after each English measure specified in the tariff, would be somewhat more burdensome for carriers. If, however, customers state in the record that they would find this additional

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

² See Notice of Proposed Rulemaking, FCC 93-134 (rel. April 8, 1993).

No. of Copies rec'd
List A B C D E

018

convenience more useful to them, Bell Atlantic would have no objection to adopting it.³

The third option, which would direct that all tariff measurements be stated in metric measures and require a conversion table to determine English units, would not assist most customers and would be more burdensome for carriers. American users are generally more familiar and comfortable with English measures, and would be confused if those measures were all suddenly changed to metric equivalents. The first two options, by contrast, would accommodate the minority of customers who prefer to calculate tariff measures in metric equivalents, without confusing the majority of customers who do not.

Finally, the Commission should acknowledge that, in many instances, the metric conversion of an English measure may need to be rounded and, therefore, may not be precisely equivalent.

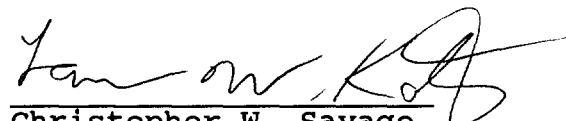
³ If customers do not support this option in their comments, then the Commission should adopt the first option.

Customers should be cautioned that metric equivalents, whether stated in a table or a parenthetical, may be approximations.

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

By Their Attorneys



Christopher W. Savage
Lawrence W. Katz

1710 H Street, N.W.
Washington, D.C. 20006
(202) 392-6580

May 26, 1993